

Monte J. White and Associates, P.C.
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

IN RE:	§	
Johnny Ray Hounshell	§	
	§	CASE NO. 10-10376-RLJ-13
	§	HEARING DATE: 8/8/2011
DEBTORS	§	HEARING TIME: 10:00 AM

DEBTOR'S RESPONSE TO TRUSTEE'S RECOMMENDATION CONCERNING
CLAIMS, OBJECTIONS TO CLAIMS AND PLAN MODIFICATION

DEBTOR, Johnny Ray Hounshell, by and through attorney, Pamela J. Chaney, files this Debtor's Response to Trustee's Recommendation Concerning Claims, Objections to Claims and Plan Modification, and respectfully shows the Court as follows:

1. Debtor wishes to surrender, in full satisfaction of the debt remaining, the 2005 RV to Bank of America.
2. Debtor requests that the payment term on all remaining secured and priority debt is extended to 60 months, thereby also extending the term of the plan to 60 months. The plan remains 100% to unsecureds.
3. Debtor also requests that the monthly Trustee payment decreases to \$920.00, beginning with the payment due in August 2011. The Chapter 13 plan base should be adjusted accordingly.

FOR THESE REASONS, Debtors ask that the Trustee's Recommendation Concerning Claims, Objections to Claims and Plan Modification denied or in the alternative, set for hearing on the date indicated.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was served on June 28, 2011 on the following parties in interest at the addresses listed below by ECF and/or regular U.S. First Class mail:

/s/Monte J. White
Attorney for Debtors

Label Matrix for local noticing
0539-1
Case 10-10376-rlj13
Northern District of Texas
Abilene
Fri Jun 24 14:46:12 CDT 2011

Recovery Management Systems Corporation
25 SE 2nd Ave. Ste. 1120
Miami, FL 33131-1605

306 Federal Building
1205 Texas Avenue
Lubbock, TX 79401-4037

Abilene Diagnostic Clinic
PO Box 5409
Abilene, TX 79608-5409

Abilene Regional Medical Center
6250 Hwy 83-84 at Antilley Road
Abilene, TX 79606

American Express
CO Becket and Lee LLP
PO Box 3001
Malvern, PA 19355-0701

American Express Centurion Bank
c o Becket and Lee LLP
POB 3001
Malvern, PA 19355-0701

Bank Of America
Attn: Bankruptcy NC4-105-02-99
PO Box 26012
Greensboro, NC 27420-6012

Bank of America, N.A.
P. O. Box 26012
NC4-105-03-14
Greensboro, NC 27420-6012

Chase
201 N. Walnut St--del-1027
Wilmington, DE 19801-2920

Chase Bank USA, N.A.
PO Box 15145
Wilmington, DE 19850-5145

Cisco College
c/o Sherrel K. Knighton
Linebarger Goggan Blair & Sampson, LLP
2323 Bryan Street, Suite 1600
Dallas, TX 75201-2644

Citibank Sd, Na
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64195-0507

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Medicredit
939 N Hwy 67
Florissant, MO 63031-2917

Monte J. White & Associates, P.C.
402 Cypress, Suite 310
Abilene, TX 79601-5151

PRA Receivables Management LLC
As Agent Of Portfolio Recovery Assocs
c/o Sears Gold Mastercard
POB 41067
Norfolk VA 23541-1067

Presbyterian Kaseman
8300 Constitution Ave.
Albuquerque, NM 87110-7613

Professional Account Services, Inc.
P.O. Box 188
Brentwood, Texas 37024-0188

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Sears-cbsd
701 East 60th St N
Sioux Falls, SD 57104-0432

Toyota Motor Credit
16945 Northchase Dr Ste
Houston, TX 77060-2135

(p)TOYOTA MOTOR CREDIT CORPORATION
PO BOX 8026
CEDAR RAPIDS IA 52408-8026

Verizon
P.O. Box 660108
Dallas, TX 75266-0108

eCAST Settlement Corporation, assignee
of Citibank (South Dakota), N.A.
POB 29262
New York, NY 10087-9262

Johnny Ray Hounshell
5017 Highway 183
Cisco, TX 76437-6247

Pamela Jean Chaney
Monte J. White & Associates, P.C.
American State Building
402 Cypress, Ste. 310
Abilene, TX 79601-5151

UST U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-1011

Walter 12,13 Ocheskey
6308 Iola Avenue
Lubbock, TX 79424-2735

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

IRS Special Procedures
Mail Code 5020-DAL
1100 Commerce St, Room 9B8
Dallas, TX 75242

(d)Internal Revenue Service
PO Box 21126
Philadelphia, PA 19114

Toyota Motor Credit Corporation
5005 North River Blvd., N.E.
Cedar Rapids, IA 52411-6634

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(u)Cisco Junior College

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